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Mr. Sam Borries
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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area Time-Critical Removal Action
Monthly Report (November 2009)

Dear Sam:

Attached is the 5th monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Paragraph 19a of the June 2009 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-09-C-925). On August 5, 2009, the United States Environmental Protection Agency determined that future updates on the Former Plainwell Impoundment TCRA project will be included in this monthly report. Per the August 6, 2009 direction of the United States Environmental Protection Agency, monthly reports will only be submitted electronically.

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS



Stephen Garbaciak Jr., P.E.
Vice President

Copies:

Mike Ribordy, USEPA
Leslie Kirby-Miles, USEPA
Richard Karl, USEPA
James Saric, USEPA
Paul Bucholtz, MDEQ
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SEDIMENTS

Date:

December 15, 2009

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Our ref:

B0064536.0001.00014

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
PLAINWELL NO. 2 DAM AREA TIME-CRITICAL REMOVAL ACTION**

REPORT #5, NOVEMBER 2009

**PREPARED BY ARCADIS
DECEMBER 15, 2009
ON BEHALF OF GEORGIA-PACIFIC LLC**

SUBMITTED TO

**SAM BORRIES, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #5, NOVEMBER 2009

Significant Developments and Activities During the Period

- On November 2, 3, 4, 5, 9, 12, 19, and 25 ARCADIS submitted to Weston (subcontractor to United States Environmental Protection Agency [USEPA]) copies of turbidity monitoring logs, air monitoring logs, analytical data, waste manifests, and/or chains of custody.
- On November 3, ARCADIS submitted to Weston a copy of Substantive Requirements Document (SRD) MIU99028.
- On November 4, ARCADIS submitted to USEPA a copy of SRD MIU99028.
- On November 4, ARCADIS received analytical data for soil and water split samples collected by Weston.
- On November 4, ARCADIS submitted a proposal to USEPA to eliminate the backfill requirement for the areas shown on Contract Drawing SR 1.5 as discussed at the October, 21 2009 Stakeholder's Meeting. Eliminating the backfill requirement would reduce erosion and expedite the project schedule. Topsoil would still be placed if needed to support vegetation. USEPA approved this proposal on November 18.
- On November 5, ARCADIS submitted to USEPA, Michigan Department of Environmental Quality (MDEQ), Michigan Department of Natural Resources (MDNR), and United States Fish and Wildlife Service (USFWS) revised contract drawings showing the canoe portage to be installed at the downstream end of Removal Area 5A.
- On November 9, ARCADIS submitted the 12th and 13th installments of the *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and MDEQ.
- On November 9, ARCADIS submitted to USEPA a summary of work performed during the 2009 construction season.
- On November 11, ARCADIS met with the owner of the Arcan Inc. property (Mr. Farrell) to discuss moving the location of Staging Area 1 from the Simons properties to their property.
- On November 12, ARCADIS submitted to CH2MHill (subcontractor to USEPA) copies of the National Wetland Inventories (NWI) characterization plan and dam removal hydraulic analysis. This information was submitted to USEPA in October.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

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- On November 13, ARCADIS submitted to USEPA the 4th *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area TCRA* for October 2009.
- On November 18, ARCADIS submitted to USEPA and MDEQ a copy of the 14th *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA*.
- On November 18, ARCADIS submitted to the owner of the Arcan Inc. property a revised property access agreement that included construction of Staging Area 1 on the Arcan property. A signed copy of the access agreement was received by ARCADIS on November 23.
- On November 19, Georgia-Pacific submitted to USEPA the Plainwell No. 2 Dam Mobilization Milestone Memorandum to provide written cost summary and confirmation that the mobilization milestone of the project work – as described in Paragraph 39.b. of the AOC – has been completed. ARCADIS submitted to USEPA a Consent Decree of the memorandum and backup on November 30.
- On November 19, ARCADIS and Georgia-Pacific hosted the monthly Stakeholder's Meeting. Representatives from MDNR and USEPA attended the meeting.
- On November 20, ARCADIS and Georgia-Pacific submitted an updated property access agreement detailing the revised locations of Staging Areas 1 and 2 to the owners of the Simons properties (Michelle and Paul Simons).
- On November 23, ARCADIS submitted to USEPA and MDEQ a copy of the 15th *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA*.
- On November 24, ARCADIS received USEPA's Fact Sheet summarizing the status of cleanup efforts at the Plainwell No. 2 Dam Area TCRA, titled *Cleanup Plan on Track for #2 Dam*.
- On November 24 and 25, ARCADIS submitted to USEPA information regarding water treated and a figure summarizing excavation status for the December 1 Kalamazoo River Superfund Update Meeting.
- On November 30, Georgia-Pacific met with the owners of the Simons properties to discuss property access.
- On November 30, USEPA released a public notice regarding the public Kalamazoo River Superfund Update Meeting to be held on December 1 in Plainwell.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
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- On November 30, ARCADIS submitted to USEPA a copy of the most recent Simons property access agreement and copies of all executed property access agreements.
- The status of property access agreements is summarized in Table A. Access to the Simons properties and to the McMurtrie property is pending.

Data Collected and Field Activities Conducted During the Period

- During the week of November 2, ARCADIS removed resuspension controls in Removal Area 5A; continued restoration activities in Removal Areas 3A, 4A, and 5A; continued decontamination of resuspension controls; continued removal of equipment from Staging Area 3; continued scraping of haul roads; and continued treatment and discharge of water collected at Staging Area 3. Processed material from the staging area was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.
- During the week of November 9, ARCADIS installed the canoe portage downstream of Removal Area 5A; continued restoration activities in Removal Areas 1, 2, 3A, and 5A; continued decontamination of resuspension controls; continued removal of equipment from Staging Area 3; continued scraping of haul roads; and continued treatment and discharge of water collected at Staging Area 3. One set of wastewater samples (W_SA3_X_007) was collected from the water treatment system located at Staging Area 3. Each set of wastewater samples consists of one influent (e.g., W_SA3_In_007), two mid-point (e.g., W_SA3_RM_007 and W_SA3_LM_007), and two effluent samples (e.g., W_SA3_RE_007 and W_SA3_LE_007). A duplicate of sample W_SA3_LE_007 (W_SA3_Dup_002) was also collected. Table B summarizes the samples collected.
- During the week of November 16, ARCADIS continued restoration activities in Removal Areas 2, 3A, 4A, and 5A; continued decontamination of resuspension controls; continued removal of equipment from Staging Area 3; and continued treatment and discharge of water collected at Staging Area 3. One set of wastewater samples (W_SA3_X_008) was collected from the water treatment system located at Staging Area 3. Table B summarizes the samples collected.
- During the week of November 23, ARCADIS completed restoration activities for the 2009 construction season; completed decontamination of resuspension controls; continued removal of equipment from Staging Area 3; began removal of Staging Area 3; and completed treatment and discharge of water collected at the Staging Area for the 2009 construction season. Visually impacted aggregate material was removed from Staging Area 3, loaded into trucks, and transported to the Ottawa County Farms Landfill in Coopersville, Michigan for disposal. The remaining aggregate material will be utilized to construct Staging Area 1 on the south side of the river.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

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- On November 30, ARCADIS continued equipment decontamination and demobilization activities and continued removal of Staging Area 3. Aggregate material from Staging Area 3 was stockpiled for transfer to and use at Staging Area 1.
- As of November 30, approximately 4,700 cubic yards of material had been excavated from Removal Areas 1, 2, 3A, 4A, and 5A and Island 1. No excavation activities were performed in November. Excavation activities are scheduled to resume in Spring 2010.

Laboratory Data Received During the Period

- During the week of November 2, ARCADIS received analytical data for USEPA split samples PD2-102209-06-SD/TS30330 and PD2-102309-01-WT/W_SA3_LE_004 (collected in October by Weston); surface water samples TS30132 to TS30134 (collected in September) and TS30135 to TS30137 (collected in October); water treatment sample set W_SA3_X_006 (collected in October), and topsoil sample TS10048 (diesel range organic and gasoline range organic only). Table B summarizes the data received.
- During the week of November 9, ARCADIS received analytical data for surface water samples TS30138 to TS30150 (collected in October) (Table B) and 14 total phosphorus samples (two samples from TP-1 to TP-5 and TP-8 and TP-9) (Table C). The phosphorus samples were collected from the Plainwell No. 2 Dam Area (TP-1 to TP-5) and the former Plainwell Impoundment (TP-8 and TP-9) in October to provide phosphorus loading concentrations to the Kalamazoo River.
- During the week of November 16, ARCADIS received analytical data for water treatment sample set W_SA3_X_007 (Table B).
- During the week of November 23, ARCADIS received analytical data for water treatment sample set W_SA3_X_008 (Table B).
- No analytical data were received on November 30.
- ARCADIS is awaiting target compound list (TCL) volatile organic compounds (VOCs), TCL semi-volatile organic compounds (SVOCs), PCBs, TCL pesticides, total organic carbon (TOC), Resource Conservation and Recovery Act (RCRA) metal, pH, and total organic carbon data for topsoil sample TS10048

**Monthly Report for the Allied Paper, Inc./Portage Creek/
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Issues Encountered and Actions Taken

- The owner of the McMurtrie property (Mr. McMurtrie) stated that he would not sign the access agreement if the proposed location of Staging Area 2 was not altered because he is concerned it will interfere with daily activities on his property, which is currently used as a horse training facility. The proposed location for Staging Area 2 is located on the Simons' properties adjacent to the McMurtrie property.
- ARCADIS and Georgia-Pacific met with the owners of the Simons properties in November to discuss access issues. The owners of the Simons properties are reluctant to allow ARCADIS to access their property and remove the vegetation necessary to support removal activities. ARCADIS and Georgia-Pacific negotiated an agreement with the owner of the Arcan Inc. property to construct Staging Area 1 on that property; therefore Staging Area 1 will no longer be located on the Simons properties. The Simons verbally agreed to allow Staging Area 2 to be constructed away from the McMurtrie property. ARCADIS, Georgia-Pacific, and the owners of the Simons properties will continue to discuss the location of access roads and a compensation package for property access in December.

Developments Anticipated During the Next Reporting Period

- During the week of December 1, ARCADIS is scheduled to attend the Kalamazoo River Superfund Update Meeting and to continue removal of Staging Area 3. Equipment and materials will be transported from Staging Area 3 to Staging Area 1.
- During the weeks of December 8, 15, 23, and 30, ARCADIS is tentatively scheduled to complete removal of Staging Area 3, complete removal of marketable timber cut down on the north side of the river, begin removal of access roads from north side of the river (for use in construction of access roads on south side of the river), continue construction of Staging Area 1, begin clearing and grubbing of access roads, and begin installing access roads on the south side of the River.
- ARCADIS is scheduled to submit a Weekly Construction Report for the Plainwell No. 2 Dam Area TCRA to USEPA for the week of December 1. Weekly Construction Reports will then be discontinued beginning the week of December 7 until significant construction activities resume in the spring of 2010.
- In December, ARCADIS will continue submitting copies of analytical data from Plainwell No. 2 Dam Area TCRA sampling activities to USEPA.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
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- In December, ARCADIS anticipates completing negotiations with property owners for the two remaining access agreements (Simons and McMurtrie). If an agreement cannot be reached with the Simons, ARCADIS will notify USEPA and ask for assistance in obtaining access.
- In December, ARCADIS plans to notify MDEQ of slight changes to the location of the treated water treatment discharge outfall points and to request approval for land discharge of treated wastewater at Staging Areas 1 and 2.

Updates to the Former Plainwell Impoundment TCRA

- During the week of November 2, ARCADIS completed bank stabilization activities in Removal Area 8 and 9B.
- During the weeks of November 2 and 9, ARCADIS completed seeding of the former haul road in Removal Areas 6B and 10A through 13A.

Developments Anticipated During the Next Reporting Period from the Former Plainwell Impoundment TCRA

- ARCADIS awaits approval from USEPA of the Construction Completion report submitted in August 2009.

Georgia-Pacific, LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA
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Table A — Summary of Property Access Agreements (as of November 30, 2009)

Date Sent	Property Owner	Parcel Number	Status
6/10/2009, revised 11/18/09	Arcan Inc. (Farrell)	08-032-010-00	accepted (original received 6/18/09, revised received 11/19/09)
5/22/2009	Consumers Energy	08-032-015-00	accepted (received 10/07/09)
7/31/2009	Diana Steele Thompson	08-032-005-10	accepted (received 8/4/09)
5/22/2009	Edward and Ronald Hodgman	08-032-027-00	accepted (received 6/3/09)
5/22/2009	Edward Mc Murtrie	08-032-042-00	in negotiations
5/22/2009	Howe Aluminum Products	08-032-028-00	accepted (received 6/3/09)
7/31/2009	MDNR	08-032-041-00 08-032-040-00	accepted (received 8/7/09)
5/22/2009, revised 11/20/09	Michelle and Paul Simons	08-032-034-10 08-032-039-00 08-032-006-00	in negotiations
7/29/2009	Steele Trust	08-033-012-00 08-033-009-00 08-033-018-00	accepted (received 8/3/09)
8/4/2009	Ray Hendricksma	08-032-033-00	accepted (received 8/7/09)
	Terry Winkle		accepted (received 8/10/09)

Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
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Table B — Summary of Samples Collected and Data Received in November 2009

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action / Notes
Confirmation Samples									
<i>PD2-102209-06-SD/TS20330</i> ¹	10/22/09	11/04/09	091403	TriMatrix Laboratories	RA 5A, Grid 1	PCBs	0.28 mg/kg J	5 mg/kg	None
Fill Material Sampling									
TS10048	10/22/09	11/05/09 (KAR) / NR (TAL)	094214 (KAR) / NR (TAL)	KAR Labs and TAL	9-part composite sample from topsoil	PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides, total organic carbon, grain size, and pH (TAL) DROs and GROs (KAR)	NR	4 mg/kg	None ^{2,3}
Surface Water Samples									
TS30132	09/24/09	11/02/09	TCRA120	TAL	RA-1 Grids 1-8; 300 feet downstream	PCBs	0.056 µg/L U	-	None
TS30133					RA-1 Grids 1-8; 200 feet upstream	PCBs	0.048 µg/L U	-	None
TS30134					Rinse Blank	PCBs	0.054 µg/L U	-	None
TS30135	10/01/09	11/02/09	TCRA121	TAL	RA-2, Grids 1-6; 300 feet downstream	PCBs	0.051 µg/L U	-	None
TS30136					RA-2, Grids 1-6; 200 feet upstream	PCBs	0.048 µg/L U	-	None
TS30137					Rinse Blank	PCBs	0.047 µg/L U	-	None
TS30138	10/08/09	11/13/09	TCRA122	TAL	RA-3A, Grids 1-11; 300 feet downstream	PCBs	0.049 µg/L U	-	None
TS30139					RA-3A, Grids 1-11 ; 200 feet upstream	PCBs	0.050 µg/L U	-	None
TS30140					Rinse Blank	PCBs	0.053 µg/L U	-	None
TS30141	10/15/09	11/13/09	TCRA123	TAL	RA-3A Grids 11-22, 200 feet upstream	PCBs	0.047 µg/L U	-	None
[TS30142]						[PCBs]	[0.047 µg/L U]	[-]	[None]
TS30143					RA-3A Grids 11-22, 300 feet downstream	PCBs	0.057 µg/L J	-	None
TS30144	10/22/09	11/13/09	TCRA123	TAL	Rinse Blank	PCBs	0.049 µg/L U	-	None
TS30145					RA-5A, 300 feet downstream	PCBs	0.047 µg/L U	-	None
TS30146					RA-5A, 200 feet upstream	PCBs	0.047 µg/L U	-	None
TS30147	10/29/09	11/13/09	TCRA124	TAL	Rinse Blank	PCBs	0.051 µg/L U	-	None
TS30148					RA-5A, 300 feet downstream	PCBs	0.050 µg/L U	-	None
TS30149					RA-5A, 200 feet upstream	PCBs	0.049 µg/L U	-	None
TS30150					Rinse Blank	PCBs	0.047 µg/L U	-	None
Water Treatment Samples									
<i>PD2-102309-01-WT/W_SA3_LE_004</i> ⁴	10/23/09	11/04/09	0910412	TriMatrix Laboratories	Left side Effluent; SA 3 Water Treatment	PCBs	0.2 µg/L U	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None
W_SA3_In_006	10/30/09	11/04/09	094351	KAR Labs	Influent; SA 3 Water Treatment	PCBs	0.5 µg/L	No Action Limit	None
W_SA3_RM_006					Right side Mid-fluent; SA 3 Water Treatment	PCBs	0.1 µg/L U	No Action Limit	None
W_SA3_RE_006					Right side Effluent; SA 3 Water Treatment	PCBs and TSS	0.1 µg/L U	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3_LM_006					Left side Mid-fluent; SA 3 Water Treatment	PCBs	0.1 µg/L U	No Action Limit	None
W_SA3_LE_006					Left side Effluent; SA 3 Water Treatment	PCBs and TSS	0.1 µg/L U	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L

See notes on page 2.

Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA
Monthly Report #5, November 2009

Table B — Summary of Samples Collected and Data Received in November 2009

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action / Notes
Water Treatment Samples (cont'd)									
W_SA3_In_007	11/10/09	11/16/09	094506	KAR Labs	Influent; SA 3 Water Treatment	PCBs	0.1 µg/L	No Action Limit	None: TSS = <4 mg/L, Action Limit = 45
W_SA3_RM_007					Right side Mid-fluent; SA 3 Water Treatment	PCBs	0.1 µg/L U	No Action Limit	None
W_SA3_RE_007					Right side Effluent; SA 3 Water Treatment	PCBs, TSS, and P	0.1 µg/L U	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.03 mg/L, No Action Limit
W_SA3_LM_007					Left side Mid-fluent; SA 3 Water Treatment	PCBs	0.1 µg/L U	No Action Limit	None
W_SA3_LE_007 [W_SA3_Dup_002]					Left side Effluent; SA 3 Water Treatment	PCBs, TSS, and P [PCBs, TSS, and P]	0.1 µg/L U [0.1 µg/L U]	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L [0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L]	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.03 mg/L, No Action Limit [None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.03 mg/L, No Action Limit]
W_SA3_In_008	11/20/09	11/23/09	094663	KAR Labs	Influent; SA 3 Water Treatment	PCBs	1.1 µg/L	No Action Limit	None
W_SA3_RM_008					Right side Mid-fluent; SA 3 Water Treatment	PCBs	0.1 µg/L U	No Action Limit	None
W_SA3_RE_008					Right side Effluent; SA 3 Water Treatment	PCBs, TSS, and P	0.1 µg/L U	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.03 mg/L, No Action Limit
W_SA3_LM_008					Left side Mid-fluent; SA 3 Water Treatment	PCBs	0.1 µg/L U	No Action Limit	None
W_SA3_LE_008					Left side Effluent; SA 3 Water Treatment	PCBs, TSS, and P	0.1 µg/L U	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.03 mg/L, No Action Limit

Notes:

- 1 - USEPA split sample of confirmation sample TS20330 (collected in October).
- 2 - Analytical results compared to applicable Part 201 cleanup criteria and Part 213 RBSLs provided in MDEQ's RRD Operational Memorandum No. 1 (Table 2, Column #19, Direct Contact Criteria & RBSLs).
- 3 - Analytical data has only been received for DROs and GROs.
- 4 - USEPA split sample of water treatment sample W_SA3_LE_004 (collected in October).

- * Duplicate samples are shown in brackets.
- * Analytical results have not been validated.
- * USEPA split sample results shown in bold italics.

DRO - diesel range organic.
GRO - gasoline range organic.
J - The compound was positively identified; however, the associated numerical value is an estimated concentration only.
mg/kg - milligrams per kilogram.
MDEQ - Michigan Department of Environmental Quality.
P - total phosphorus.
PCBs - polychlorinated biphenyls.
RA - Removal Area.
RBSL - Risk Based Screening Level.
RCRA - Resource Conservation and Recovery Act.
RRD - Remediation Redevelopment Division.

SA - Staging Area.
SVOCs - semi volatile organic compounds.
TAL - Test America Laboratories.
TCL - target compound list.
TSS - total suspended solids.
U - Compound analyzed but not detected at a concentration above the reporting limit.
mg/L - milligrams per liter.
µg/L - micrograms per liter.
USEPA - United States Environmental Protection Agency.
VOCs - volatile organic compounds.

Georgia-Pacific LLC
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Table C — Summary of Total Phosphorus Samples Collected in October and Data Received in November 2009

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Total Phosphorus Result (mg/kg)
Total Phosphorus Samples from the Plainwell #2 TCRA						
TP-1 (0.0 - 0.5)	10/29/09	11/12/09	094352	KAR Labs	Top-of-bank sample from RA 6, 0.0 to 0.5 foot interval	3,840
TP-1 (0.7 - 0.9)					Top-of-bank sample from RA 6, 0.7 to 0.9 foot interval	77
TP-2 (0.0 - 0.3)	10/22/09				Top-of-bank sample from RA 5A, 0.0 to 0.3 foot interval	3,570
TP-2 (1.0 - 1.3)					Top-of-bank sample from RA 5A, 1.0 to 1.3 foot interval	42.4
TP-3 (0.0 - 0.5)	10/29/09				Top-of-bank sample from island near Oxbow, 0.0 to 0.5 foot interval	3,360
TP-3 (0.5 - 1.3)					Top-of-bank sample from island near Oxbow, 0.5 to 1.3 foot interval	47.3
TP-4 (0.0 - 0.3)					Top-of-bank sample from RA 5B, 0.0 to 0.3 foot interval	4,660
TP-4 (0.8 - 0.9)					Top-of-bank sample from RA 5B, 0.8 to 0.9 foot interval	1,560
TP-5 (0.0 - 0.3)					Top-of-bank sample from RA 4B, 0.0 to 0.3 foot interval	2,380
TP-5 (0.6 - 0.8)					Top-of-bank sample from RA 4B, 0.6 to 0.8 foot interval	2,340
Total Phosphorus Samples from the Former Plainwell Impoundment TCRA						
TP-8 (0.0 - 0.4)	10/29/09	11/12/09	094352	KAR Labs	Top-of-bank sample from transect T-2 of the Former Plainwell Impoundment, 0.0 to 0.4 foot interval	2,360
TP-8 (0.7 - 2.0)					Top-of-bank sample from transect T-2 of the Former Plainwell Impoundment, 0.7 to 2.0 foot interval	2,070
TP-9 (0.0 - 0.6)					Top-of-bank sample from transect T-1 of the Former Plainwell Impoundment, 0.0 to 0.6 foot interval	2,220
TP-9 (0.6 - 1.2)					Top-of-bank sample from transect T-1 of the Former Plainwell Impoundment, 0.6 to 1.2 foot interval	1,710

Notes:

* Analytical results have not been validated.

mg/kg - milligrams per kilogram

RA - Removal Area